IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF TEXAS EL PASO DIVISION

STEPHEN BOLLSCHWEILER,	§	
RAYMOND C. ARMENDARIZ,	§	
DANIEL DUCHENE, JOSE J.	§	
CALZADILLA, HERLINDA A. AVILA,	§	
SHARON HOOVER, RAY A MERRILL	§	NO. 3:14-CV-00275-DB
SR., and ADRIAN J. NUNEZ	§	
	§	
Plaintiffs	§	
	§	
v.	§	
EL PASO ELECTRIC COMPANY,	§	
	§	
Defendant	§	

DEFENDANT'S LIST OF VOIR DIRE QUESTIONS

Under Local Rule CV-16(e)(1), Defendant El Paso Electric Company ("EPE" or "Defendant") submits the following list of questions EPE desires the Court to ask prospective jurors during voir dire:

- 1. Have you or any of your family members worked for El Paso Electric Company?
- 2. Have any of you had negative experiences with El Paso Electric Company?
- 3. Do any of you hold negative feelings towards El Paso Electric Company?
- 4. Have any of you or any of your family members ever worked for a utility company?
- 5. How many of you are paid a set salary (versus an hourly rate)? How many of you are paid by the hour?
- 6. Have any of you ever complained to an employer that you thought you were not being paid fairly?
- 7. Are you in a union at work? Have any of you ever been a member of a union?
- 8. Have you heard of the Fair Labor Standards Act?
- 9. Do any of you think it is unfair for a company to pay employees a salary instead of hourly?

- 10. Please raise your hand if you don't get overtime pay but think you should get overtime pay.
- 11. Do you know anyone in this courtroom, including other potential jurors?
- 12. Before hearing any evidence in this case, do you think that most large corporations are unkind toward their employees?
- 13. Do you believe that, as a general rule, most large corporations treat their employees in an unfair way?
- 14. Do you think that you or a family member has been discriminated against by your past or current employer?
- 15. Have you ever felt forced or pushed out of a job?
- 16. Is there any reason why you would not be a good juror for this particular case?
- 17. Have any of you ever worked for a public entity (city, police, fire, school, etc.)?
- 18. Have any of you ever worked in retail?

Respectfully submitted,

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ATTORNEYS FOR DEFENDANT

CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the foregoing was forwarded to Plaintiffs' Counsel via ECF notification on October 26, 2015.

/s/ Jeremy W. Hawpe Jeremy W. Hawpe

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